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June 22, 2018

BY HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

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FRONT DESK

Re: Amended Petition of State Senator Andrew E. Dinniman for Interim Emergency
Relief; Docket Nos. P-2018-3001453 and C-2018-3001451; **Sunoco Pipeline L.P.
Compliance Filing (PUBLIC VERSION)**

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's June 15, 2018 Order, Sunoco Pipeline L.P. (SPLP) submits the attached compliance filing. As this filing is greater than 250 pages, SPLP has also provided it on the enclosed flash-drive. This filing omits all Confidential Security Information and Highly Confidential Information, which is being filed under separate cover.

Respectfully submitted,

Thomas J. Sniscak

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cc: Bert Marinko, Office of Special Assistants
Per Certificate of Service

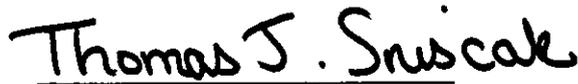
CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the forgoing document is being served upon the parties, listed below, via hand delivery and in accordance with the requirements of § 1.54 (relating to service by a party). This document has been filed with the Commission and served hand-delivery on the following parties:

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Dated: June 22, 2018



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June 22, 2018

Via Hand Delivery

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Dear Ms. Chiavetta:

On June 14, 2018, the Pennsylvania Public Utility Commission (the "Commission") issued an Opinion and Order (the "Order") that reversed Administrative Law Judge ("ALJ") Barnes' order (the "ALJ Order") granting emergency relief in so far as the ALJ Order enjoined the operation of the Mariner East 1 pipeline. The Order also reversed paragraphs 8-20 of the ALJ Order to the extent that those paragraphs impose additional requirements upon Sunoco Pipeline L.P. ("SPLP") relating to the operation of Mariner East 1 and construction of Mariner East 2 and 2X. Finally, the Order continued the suspension of construction on the Mainer East 2 and 2X pipelines in West Whiteland Township, Chester County, subject to specified conditions in paragraph 6 and 7 of the Order.

To obtain the Commission's approval to resume construction of the Mariner East 2 and 2X pipelines in West Whiteland Township, in accordance with paragraph 6 of the Order, SPLP is required to file certain information and documentation with the Commission within twenty days. Please accept this correspondence and its attachments in response to paragraph 6 of the Order. Because of the volume of documentation provided, this letter explains how the documents satisfy the requirements of paragraph 6 of the Commission's Order. For ease of reference, the documents are provided in three-ring binders with tabs separating each document.

It is important to note that one of the assertions made by Senator Dinniman in his complaint and during his testimony at the hearing before ALJ Barnes was that SPLP had not made information about safety and emergency response issues relating to these pipelines available to the public. At the hearing before ALJ Barnes, SPLP presented testimony and introduced documents into evidence showing that, in fact, this information existed and much of it was not only publicly available, but had been provided to residents, public officials, and emergency responders through direct mailings, and was provided at trainings and public meetings. Notwithstanding these facts, SPLP is providing copies of this information to the Commission and the parties in this one comprehensive submission, including information regarding certain standard operating procedures that the public has not been previously provided.

With the submission of the enclosed information and documents, SPLP respectfully requests that the Commission determine that SPLP has complied with paragraph 6 of the Order so that the injunction against construction of the Mariner East 2 and 2X pipelines in West Whiteland Township is lifted when SPLP provides a verification or affidavit that the Pennsylvania Department of Environmental Protection has issued permission for construction of the Mariner East 2 and 2X pipelines in West Whiteland Township in accordance with paragraph 7 of the Order. SPLP respectfully requests that this matter be placed on the agenda for consideration at the Commission's July 12, 2018 public meeting.

Response to Paragraph 6(a)(1)(a)-(c)

Paragraph 6(a)(1)(a)-(c) of the Order requires SPLP to submit copies of its inspection and testing protocols, including, but not limited to: (a) preventative inspection and maintenance; (b) leak detection and repairs; and (c) frequency of inspections and testing.

In accordance with Pipeline and Hazardous Materials Safety Administration ("PHMSA") regulations, SPLP has adopted and implements a detailed series of standard operating procedures ("SOPs") that govern inspection, maintenance, leak detection, and repairs of the pipelines it operates. Enclosed are copies of the following SOPs for hazardous liquids pipelines and related facilities, which detail the inspection, maintenance, leak detection, repair, and testing protocols implemented by SPLP. Further, as requested by paragraph 6(a)(1)(c) of the Order, the frequency of inspections and testing performed by SPLP is listed in Section 4 of each respective SOP.

SPLP's protocols related to **pipeline operations** are labeled with the prefix "HLI." The following SOPs are the relevant protocols required by the Order:

- **SOP HLI.01 – Pipeline Shutdown and Startup**: establishes requirements for starting up and shutting down any part of the pipeline in a manner designed to assure operation within the [Maximum Operating Pressure] limits prescribed by this SOP, plus the build-up allowed (110%) for operation of pressure-limiting and control devices. Copy attached as Exhibit 1.
 - o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- **SOP HLI.05 – Pipeline Repair**: establishes the requirements for repairing pipelines when the strength of the pipe has been reduced by corrosion, mechanical damage, weld defects, material defects, or other injurious defects per *SOP HLI.06 Evaluating Pipeline Defects*. Copy attached as Exhibit 2.
 - o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- **SOP HLI.06 – Evaluating Pipeline Defects**: describes the steps required to consistently characterize and evaluate defects in a pipeline. Copy attached as Exhibit 3.
 - o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- **SOP HLI.08 – Lowering or Raising In-Service Pipeline**: describes how to lower or raise a liquids pipeline due to soil erosion, road crossings, cultivation, shorted casings, subsidence, or other

reasons. This SOP also establishes guidelines to prevent over-stressing operating pipelines when lifting. Copy attached as Exhibit 4.

o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*

- SOP HLI.10 – Excavation and Backfill: describes how to provide adequate support and protection of company pipeline facilities during excavation and backfilling activities. Copy attached as Exhibit 5.

o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*

- SOP HLI.11 – Pipeline Pressure Limit Criteria: describes the scenarios and guidelines used when a pressure reduction is required prior to excavating a pipeline or prior to making a repair. This SOP establishes maximum pressures at which a pipeline is operated during maintenance and repair projects. Copy attached as Exhibit 6.

- SOP HLI.12 – Pipeline Facilities Identification: describes the various methods used to identify company pipelines and related facilities, as well as the activities involved with the placement and maintenance of the different types of identification markers. Copy attached as Exhibit 7.

o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*

- SOP HLI.21 – Inspection of ROW- Crossings Under Navigable Waters: establishes the requirements inspection of rights-of-way (ROW) and crossings under navigable waters. Methods of inspection include walking, driving, flying or other appropriate means of traversing the right-of-way. Copy attached as Exhibit 8.

o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*

- SOP HLI.23 – Protection of Pipeline Facilities From the Blasting Operations: describes the steps and necessary precautions to be taken when blasting operations are to be conducted within 300 feet of the company's facilities. Copy attached as Exhibit 9.

o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*

- SOP HLI.24 – Management of Depth of Cover and Evaluation: outlines activities directed at the management of depth of cover for the purpose of minimizing the possibility of damage to pipelines as a result of shallow cover or exposure. Copy attached as Exhibit 10.

o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*

- SOP HLI.25 – Aboveground Components- Overhead Crossings: establishes minimum requirements for the inspection of pipeline bridges and spans crossing identified waterways. Copy attached as Exhibit 11.

o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*

- SOP HLI.26 – Mining Subsidence and Soil Slippage: establishes the requirements for identifying, investigating, and controlling mining operations, subsidence, and soil slippage. Copy attached as Exhibit 12.

- *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- **SOP HLI.27 – Abnormal Loading External Loads Hwy RR:** describes how to evaluate the effects of abnormal external loading on the pipeline, highway and railroad crossings. Copy attached as Exhibit 13.
 - *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- **SOP HLI.28 – Right of Way Encroachments:** describes how to manage Right-of-Way (ROW) encroachments. Copy attached as Exhibit 14.
 - *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- **SOP HLI.29 – Right-of Way Maintenance:** establishes the requirements for maintenance of pipeline right-of-way as it pertains to clearing the Right-of-Way (ROW), providing erosion control remediation, maintenance of pipeline markers and test sites, restoring exposed or shallow pipelines, and maintaining access roads. Copy attached as Exhibit 15.
 - *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- **SOP HLI.30 – Mechanical Damage:** outlines the actions which need to be followed by company personnel to verify the integrity of the pipeline where mechanical damage is suspected. Mechanical Damage may be caused by First, Second, or Third Parties. Copy attached as Exhibit 16.
 - *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- **SOP HLI.31 – One-Call System Response:** describes the guidelines to prepare for, manage, and respond to One-Call notifications. Copy attached as Exhibit 17.
 - *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- **SOP HLI.34 – Use of Ultrasonic Thickness Equipment for Measurement of Wall Thickness:** describes the use of Ultrasonic Thickness (UT) Equipment to determine existing or remaining wall thickness measurements on pipeline facilities. The wall thickness measurement may be needed for but not limited to pipe wall thickness verification, lamination verification and dimensions, internal corrosion verification, and hot tap placement. Copy attached as Exhibit 18.
 - *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- **SOP HLI.40 – Public Awareness Plan-Communications with API RP1162-defined stakeholders:** establishes the guidelines for the communication with the following four audience groups – Affected Public, Emergency Officials, Public Officials and Excavators – under the Public Awareness Plan. Copy attached as Exhibit 19.
 - *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*

SPLP's protocols related to **corrosion** are labeled with the prefix "HLD." The following SOPs are the relevant protocols required by the Order:

- SOP HLD.01 – Corrosion Control Supervisor Qualifications: establishes that supervisors will maintain thorough knowledge of the portion of corrosion control for which they are responsible for insuring compliance. Copy attached as Exhibit 20.
- SOP HLD.03 – Structure to Electrolyte Potential Measurement: describes how to take voltage measurements of the electrochemical potential of the pipe or other metallic structures in an electrolyte such as soil or water. Copy attached as Exhibit 21.
- SOP HLD.06 – Soil Resistivity Measurement: describes the determination of soil resistivity at various depths or at specific points, depending on the method used. Copy attached as Exhibit 22.
- SOP HLD.08 – Exothermic Weld: describes the requirements to perform an exothermic weld. Copy attached as Exhibit 23.
- SOP HLD.09 – CP Current Source System Installation and Inspection: establishes the requirements for installing and inspecting impressed current Cathodic Protection (CP) systems and documenting results. Copy attached as Exhibit 24.
- SOP HLD.10 – Anode Bed Inspection and Installation: describes the inspection of impressed current cathodic protection anode beds. Copy attached as Exhibit 25.
- SOP HLD.12 – Casing Isolation Testing: describes tests to identify and locate an electrical short circuit between casing and carrier pipe at cased pipeline locations. Copy attached as Exhibit 26.
- SOP HLD.13 – Electrical Isolation Devices: describes how to install components and equipment to isolate them from a Cathodic Protection System as well as perform isolation testing. Copy attached as Exhibit 27.
- SOP HLD.14 – Interference Testing and Mitigation: describes the detection, measurement, mitigation, and documentation of stray current interference from foreign sources, such as nearby pipeline cathodic protection systems, direct current powered transit systems, and mining operations. Copy attached as Exhibit 28.
- SOP HLD.15 – Close Interval Surveys: describes Close Interval Surveys (CIS) conducted by company personnel or contractors. Copy attached as Exhibit 29.
- SOP HLD.19 – Critical Bond Inspection: describes how to monitor critical bonds. Copy attached as Exhibit 30.

- SOP HLD.20 – Annual Corrosion Control Surveys: describes how to conduct the Annual Corrosion Control Survey of company facilities. Copy attached as Exhibit 31.
- SOP HLD.21 – Measuring IR Drop: describes how to measure or calculate the approximate IR¹ drop in structure-to-electrolyte potential measurements. Copy attached as Exhibit 32.
- SOP HLD.22 – Application of Cathodic Protection Criteria: establishes the requirements for achieving adequate cathodic protection (CP). Copy attached as Exhibit 33.
- SOP HLD.23 – Induced AC Measurement and Mitigation: describes how to perform alternating current (AC) induction measurements and mitigation efforts. Copy attached as Exhibit 34.
- SOP HLD.25 – Cathodic Protection System Design: describes requirements for design of galvanic and impressed current cathodic protection systems. Copy attached as Exhibit 35.
- SOP HLD.29 – Coating Resistance Measurement: describes testing methods for obtaining coating resistance measurements on below ground, coated pipelines. Copy attached as Exhibit 36.
- SOP HLD.30 – Internal Corrosion Monitoring and Mitigation: describes internal corrosion monitoring and mitigation for the pipeline system. Copy attached as Exhibit 37.
- SOP HLD.32 – Weight Loss Coupons for Internal Corrosion Monitoring: describes the selection and use of weight loss coupons as an internal corrosion monitoring device. Copy attached as Exhibit 38.
- SOP HLD.33 – Internal Corrosion Monitoring Devices: describes a variety of intrusive and non-intrusive devices available to monitor internal corrosion in the pipeline system. Copy attached as Exhibit 39.
- SOP HLD.35 – Pipe Inspections and Evaluations: describes the inspection of buried pipe and coatings whenever any portion of a buried pipeline is exposed or found to be exposed. Copy attached as Exhibit 40.
- SOP HLD.36 – Investigation of Pipeline Anomalies: provides protocols for investigating anomalies to obtain data regarding the status and root cause of the mechanism. Sections of this SOP are applicable to both anomalies discovered above grade, or following excavation of the pipeline. Copy attached as Exhibit 41.

¹ As referenced in this SOP, “IR drop” is a method used to determine cathodic protection, and does not refer to, and should not be confused with, an inadvertent return (i.e. an “IR”) of drilling mud from horizontal directional drilling operations.

- SOP HLD.38 – Analysis of Solid and Liquid Samples: describes the steps for obtaining and handling of liquid samples, solid samples of corrosion byproducts for further evaluation. Copy attached as Exhibit 42.
- SOP HLD.39 – Bacterial Corrosion Tests: describes testing for the presence of Sulfate Reducing Bacteria (SRB) and/or Acid Producing Bacteria (APB). Copy attached as Exhibit 43.
- SOP HLD.40 – Corrosion Control Remedial Action: establishes the requirements to initiate and complete remedial action necessary to restore corrosion control to aboveground and below ground structures. Copy attached as Exhibit 44.
- SOP HLD.43 – Protective Coating Systems: describes how to use coating manuals and standards in order to select protective coating systems. Copy attached as Exhibit 45.
- SOP HLD.44 – Atmospheric Pipe Inspection: establishes the requirements and frequency for conducting atmospheric inspections on company assets to detect coating deterioration and corrosion damage. Copy attached as Exhibit 46.
- SOP HLD.45 – Wet Magnetic Particle Inspection: describes the method of Wet Magnetic Particle Inspection (MPI) for locating surface breaking indications on line pipe and other ferrous components. Copy attached as Exhibit 47.
- SOP HLD.47 – Evaluation of Remaining Strength of Pipeline Metal Loss: describes details of evaluation methods used to determine the remaining strength of ductile carbon steel pipe with metal loss. Copy attached as Exhibit 48.

SPLP's protocols related to **valve operations** are labeled with the prefix "HLM." The following SOPs are the relevant protocols required by the Order:

- SOP HLM.01 – Mainline Valve Inspection, Maintenance and Location: describes the activities associated with Mainline valve inspection, maintenance and operation. Copy attached as Exhibit 49.
- SOP HLM.02 – Automatic Control Valves: describes the company requirements for the test, inspection, and maintenance of automatic control valves, level controls, over pressure protection set-points along with their associated controllers and positioners. Copy attached as Exhibit 50.
- SOP HLM.04 – Pressure Protection and Relief Valve Capacity Verification: describes the data verification and relief valve capacity calculation requirements necessary to protect the Maximum Operating Pressure (MOP) within the MOP plus the build-up allowed for operation of pressure limiting and control devices. Copy attached as Exhibit 51.

- SOP HLM.05 – Relief Valves Testing Inspection and Maintenance: describes the testing and inspection and maintenance of relief valves used in liquid and storage tank services. Copy attached as Exhibit 52.

SPLP's protocols related to various **overarching operational, inspection, maintenance, leak detection, repair, and testing** issues are labeled with the prefix "HLB." The following SOPs are the relevant protocols required by the Order:

- SOP HLB.03 – Purging: describes how to purge facilities for maintenance and to prepare them for in-service. Copy attached as Exhibit 53.
- SOP HLB.04 – Pipe Location and Marking: describes how to locate and mark company underground facilities using pipe locators. Copy attached as Exhibit 54.

In addition, in response to paragraph 6(a)(1)(b), SPLP has adopted and implements several specific protocols and procedures for **leak detection and repairs**, some of which are set forth above, as follows:

- SOP HLI.05 ~ Pipeline Repair: establishes the requirements for repairing pipelines when the strength of the pipe has been reduced by corrosion, mechanical damage, weld defects, material defects, or other injurious defects per SOP HLI.06 Evaluating Pipeline Defects. Copy attached as Exhibit 2.
 - o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- SOP HLI.06 ~ Evaluating Pipeline Defects: describes the steps required to consistently characterize and evaluate defects in a pipeline. Copy attached as Exhibit 3.
 - o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- SOP HLI.21 ~ Inspection of ROW- Crossings Under Navigable Waters: establishes the requirements inspection of rights-of-way (ROW) and crossings under navigable waters. Methods of inspection include walking, driving, flying or other appropriate means of traversing the right-of-way. Copy attached as Exhibit 8.
 - o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- SOP HLI.23 ~ Protection of Pipeline Facilities From the Blasting Operations: describes the steps and necessary precautions to be taken when blasting operations are to be conducted within 300 feet of the company's facilities. Copy attached as Exhibit 9.
 - o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*
- SOP HLI.28 ~ Right of Way Encroachments: describes how to manage Right-of-Way (ROW) encroachments. Copy attached as Exhibit 14.
 - o *This SOP was admitted as part of SPLP-Exhibit 33 at the hearing before ALJ Barnes.*

[BEGIN Highly Confidential Information subject to non-disclosure under the Protective Order and the Public Utility Confidential Security Information Disclosure Protection Act.] [REDACTED]

[END Highly Confidential Information subject to non-disclosure under the Protective Order and the Public Utility Confidential Security Information Disclosure Protection Act.]

Paragraph 6(a)(2)(a)-(c)

Paragraph 6(a)(2)(a)-(c) of the Order requires SPLP to submit copies of its comprehensive emergency response plan, including, but not limited to: (a) communications and coordination necessary to report and respond to a release or ignition of highly volatile liquids from pipelines or appurtenances; (b) public educational materials and notification protocols intended to instruct how affected parties along the right-of-way should respond and how Sunoco Pipeline will notify the public in the event of a pipeline-related incident; and (c) specific procedures pertaining to coordination with state and local officials, local fire, police, the Pennsylvania Emergency Management Agency, the Pipeline Hazardous Materials Safety Administration, this Commission, and other utilities located in West Whiteland Township in responding to an incident.

Response to Paragraph 6(a)(2)(a)

In accordance with PHMSA regulations, SPLP has adopted and implements SOPs that establish **specific emergency response procedures**, which include plans that address **communications and coordination for reporting and responding to a release from a pipeline or related facility**, and consist of the following:

- **SOP HLA.04 – Initial Reporting and Investigating Events**: establishes a process for observing, reporting and investigating events that involve, or have the potential to involve, loss to people, property or process. Copy attached as Exhibit 56.
- **SOP HLA.08 – Field Emergency Response Procedures**: provides instruction and guidance to field employees when preparing for and responding to an emergency event. Copy attached as Exhibit 57.
- **SOP HLA.15 – PHMSA/States - Accident Reporting**: lists processes, guidelines and responsibilities for accident reporting. Copy attached as Exhibit 58.
- **SOP HLA.19 – Area Emergency Response Plan Development Maintenance**: establishes the requirements for written Emergency Response Plans. These plans contain vital information that may be needed during first response to an emergency including reference to pre-planned procedures and contact and resource information for emergency response agencies, local law enforcement, support contractors, materials, and supplies. Copy attached as Exhibit 59.

- SOP CRM.11 – Emergency Response Procedures: provides instruction and guidance to Control Room employees when preparing for and responding to an emergency event. Copy attached as Exhibit 60.

In addition to these SOPs, SPLP implements a Control Center Incoming Call Procedure that provides specific guidance for handling incoming phone calls, and in particular, procedures related to reports of potential releases from the pipelines or other facilities. Copy attached as Exhibit 61. SPLP also utilizes a Spill Notification and Response Flowchart that serves as a quick reference and summary of emergency response protocols in the event of a release. This flowchart also identifies when local emergency responders will be contacted in the event of a release. Copy attached as Exhibit 62.

[BEGIN Highly Confidential Information subject to non-disclosure under the Protective Order and the Public Utility Confidential Security Information Disclosure Protection Act.] [REDACTED]

[REDACTED] **[END Highly Confidential Information subject to non-disclosure under the Protective Order and the Public Utility Confidential Security Information Disclosure Protection Act.]**

Response to Paragraph 6(a)(2)(b)-(c)

In accordance with Section 195.440 of PHMSA's regulations, SPLP has developed and implements a Public Awareness Plan, which is outlined in SPLP's SOP HLA.17 – Public Awareness Plan. Copy attached as Exhibit 64. SPLP's Public Awareness Plan includes, among other things, periodic communications to affected members of the public, excavators, local public officials, and local emergency responders. SPLP also provides detailed periodic training for emergency response personnel and excavators operating in communities where SPLP's pipelines and related facilities are located.

In accordance with SPLP's Public Awareness Plan, every two years, SPLP sends direct mailings to members of the public in the communities where its pipelines and related facilities are located. These direct mailings include a detailed brochure, titled "Important Safety Message for Your Neighborhood," which is printed in both English and Spanish, and is updated periodically. A copy of the most recent version of this brochure is attached as Exhibit 65, and was admitted as SPLP-Exhibit 46 at the hearing before ALJ Barnes. This brochure provides detailed information regarding: pipeline safety procedures; how to use the 811 One-Call system; how to identify the location of a pipeline; how to recognize a pipeline leak; what to do and not to do in the event a leak were to occur; what to do if one witnesses damage to a pipeline; information on right-of-way; contact information for emergency and non-emergency events; and links to websites with additional information. A similar informational brochure is sent to members of the farming and ranching community, entitled "Important Safety Message for the Farming & Ranching Community," which is also provided in both English and Spanish, and is updated periodically. The most recent version of this brochure is attached as Exhibit 66. These mailings were last sent in 2016, and are scheduled to be sent again in September 2018.

Each year, SPLP sends direct mailings to excavators working in communities where its pipelines and related facilities are located. SPLP's brochure for excavators, titled "Important Safety Message About Safe Excavation and Digging," is provided in both English and Spanish, and is periodically updated. The most recent version of this brochure is attached as Exhibit 67. This brochure provides detailed information regarding: the 811 One-Call System and procedures; how to know where pipelines are located; how to recognize a pipeline leak; what to do and not to do in the event a leak were to occur; what to do in the case of damaging/disturbing a pipeline; what SPLP does if a leak occurs; a summary of SPLP's safety and integrity management procedures; information on right-of-way; information on publicly-available pipeline mapping systems; contact information for emergency and non-emergency events; and links to websites with additional information. These mailings are distributed annually, and are scheduled to be sent again in September 2018. SPLP also provides annual training programs for excavators, as set forth greater detail below.

Every three years, SPLP sends direct mailings to public officials in the communities where SPLP's pipelines and related facilities are located, which include a letter providing information on pipeline safety and a brochure with detailed safety information similar to those distributed to members of the public. SPLP's Letter to Public Officials and corresponding brochure titled "Important Safety Message for Your Community," which is periodically updated, is attached as Exhibit 68, and was admitted as SPLP-Exhibit 10 at the hearing before ALJ Barnes. These materials provide detailed information regarding: the contents of pipelines and potential hazards related to pipelines; information regarding planning, zoning, and property development; information on the use of the 811 One-Call system; a summary of emergency response procedures for pipeline incidents and how SPLP responds to those incidents; how to recognize a pipeline leak; how to know where pipelines are located; a summary of SPLP's safety and integrity management procedures; information on right-of-way; information on publicly-available pipeline mapping systems; contact information for emergency and non-emergency events; and links to websites with additional information. These mailings were last sent in 2016, and are scheduled to be sent again in September 2018, which is sooner than the three-year cycle, because of the construction of Mariner East 2 and 2X. SPLP also provides annual training programs for public officials, as set forth in greater detail below.

Each year, SPLP also sends direct mailings to local emergency responders in the communities where SPLP's pipelines and related facilities are located, including a letter that provides details on free training for responding to pipeline emergencies, and specific training provided directly by SPLP, which is described in greater detail below. These direct mailings also include a detailed brochure titled "Important Safety Message for Emergency Response Personnel," which is periodically updated. SPLP's 2017 letter to local emergency responders and most recent version of the informational brochure are attached as Exhibits 69 and 70. This brochure provides detailed information regarding: guidelines for responding to a pipeline emergency; 911 dispatch procedures; how to know where pipelines are located; how SPLP responds to incidents; how to recognize a pipeline leak; the contents of pipelines and potential hazards related to pipelines; a summary of SPLP's safety and integrity management procedures; a summary of emergency response procedures for pipeline incidents; information on publicly-available pipeline mapping systems; contact information for emergency and non-emergency

events; and links to websites with additional information. These mailings are distributed annually, and are scheduled to be sent again in September 2018. SPLP also provides annual training programs for emergency responders, as set forth in greater detail below.

Through its public awareness program, SPLP has sent out tens of thousands of direct mailings to members of the public, excavators, local officials, and emergency responders in Chester County, including West Whiteland Township. By way of example, as reflected in the chart attached as Exhibit 71, in 2016, SPLP sent direct mailings to:

- 14,006 residential properties and P.O. boxes
- 3,771 local businesses
- 140 farmers
- 3,167 excavators
- 186 emergency responders
- 147 public officials
- 7 school districts
- 89 schools

These direct mailings were sent to Senator Dinniman and other local public officials, including the West Whiteland Township Manager, First Selectman, Building Official, and Planning Director. These direct mailings were also sent to the West Whiteland Township Police Chief, the West Whiteland Fire Chief, and the West Whiteland Township Emergency Services Director.

SPLP also maintains detailed public awareness and safety information on its website, which includes copies of each of these direct mailings and brochures,² a list of emergency and non-emergency contact telephone numbers,³ information regarding activities on pipeline rights-of-way,⁴ and information about damage prevention.⁵

Further, in accordance with SPLP's Public Awareness Plan, SPLP holds various training events for emergency responders and excavators in the communities where SPLP's pipelines and related facilities are located. This training includes the Coordinated Response Exercise for First Responders ("CORE"), which is provided annually to local emergency responders, excavators, and public officials throughout

² The informational pamphlet for each stakeholder group, is available at <http://www.sunocologistics.com/Public-Awareness-Safety/Public-Awareness/110/>

³ A list of SPLP emergency contact telephone numbers is available at <http://www.sunocologistics.com/Public-Awareness-Safety/Emergency-Contact-Numbers/76/>

⁴ Right-of-way information is available at <http://www.sunocologistics.com/Public-Awareness-Safety/Right-Of-Way/73/>

⁵ Damage prevention information is available at <http://www.sunocologistics.com/Public-Awareness-Safety/Damage-Prevention/248/>

Pennsylvania, and coordinated by SPLP together with other pipeline operators in Pennsylvania.⁶ The invitation sent to emergency responders, excavators, and public officials for the 2017 CORE training sessions, together with the brochures and informational CORE materials, are attached as Exhibit 73.

A copy of the 2017 CORE Emergency Response Manual that was developed for and provided during this training is attached as Exhibit 74. A copy of the presentation provided during the 2017 CORE training is attached as Exhibit 75. The primary objective of the CORE training is to bring together pipeline operators and first responders to pre-plan for pipeline emergency response. Each CORE training session includes a local pipeline incident scenario that allows responders and pipeline personnel to interact and talk through resources and capabilities.

In 2017, SPLP sponsored 16 CORE training sessions that were attended by 1,229 emergency responders. Invitations were sent to 3,868 emergency officials, public officials, schools, excavators, and the media in Chester County, including invitations sent directly to the West Whiteland Township Manager, First Selectman, Building Official, Planning Director, and Public Works Director. Members of the West Whiteland Township Police Department, West Whiteland Fire Department, and the West Whiteland Township Emergency Services Department. From Chester County, 42 individuals attended CORE training in 2017, which included 22 emergency responders and 7 public officials. See Table 2-1, Training Sessions Sponsored by SPLP in Pennsylvania in 2017, attached as Exhibit 76.

In addition to the CORE training, SPLP holds periodic emergency response training specifically related to the Mariner East pipelines and related facilities, called the Mariner East Responder Outreach (“MERO”) training.⁷ The MERO training, led by national pipeline emergency response expert Gregory Noll (bio attached as Exhibit 77), has been held each year since 2013 in the communities where the Mariner East pipelines and related facilities are located. Photographs of some the MERO training sessions are attached as Exhibit 78. A copy of the MERO training presentation is attached as Exhibit 79, and a copy of the 2015 presentation is also available directly on SPLP’s website.⁸ A copy of this training presentation was also admitted as SPLP-Exhibit 11 at the hearing before ALJ Barnes. The MERO training focuses on pipeline awareness, location of pipelines and related facilities, the National Pipeline Mapping System, characteristics of the products contained in pipelines, and emergency response procedures, including release recognition, communication and unified command, and guidance for suggested

⁶ Information on the CORE training was previously provided to the Commission’s Investigation and Enforcement Bureau’s Safety Division in response to the Commission’s February 16, 2018 Information Request Number L-01-18, a copy of which is attached as Exhibit 72. This information request was a component of the Commission’s independent evaluation of SPLP’s contingency plans and evaluation of the potential safety risks associated with the Mariner East 1, Mariner East 2 and 2X pipelines.

⁷ Information on the MERO training was also previously provided to the Commission in response to Information Request Number L-01-18.

⁸ A copy of the Mariner East Responder Outreach presentation is available at <http://www.sunocologistics.com/SiteData/docs/PipelineLP/6ecbe6bdd2ee06ae/Pipeline%20LPG%20Response%20-%20MERO-ME-.pdf>

emergency response. Upon request by emergency responders, SPLP also offers refresher training and training for new personnel that can occur, and has occurred, on a periodic and ad hoc basis throughout the year.

In the past five years, 1,950 Pennsylvania emergency responders participated in the MERO training for the Mariner pipelines and related facilities – 664 of which participated in training directly related to the Mariner East 2 and 2X pipeline project in 2017. See Table 1-1 Summary of MERO Attendance by State and Program, attached as Exhibit 80. Of the 1,950 emergency responders who participated in training for the Mariner East pipelines and related facilities, 205 were from Chester County, and 95 were trained specifically on the Mariner East 2 and 2X pipeline project in 2017. See Table 1-2 MERO Attendance In Pennsylvania By County and Session Type, attached as Exhibit 81. Since 2013, 28 members of the West Whiteland Fire Company received training on the Mariner East pipelines and related facilities. See Table 1-3. Pennsylvania MERO attendees by County-Training Date-Agency-Title, attached as Exhibit 82; see also Attendance Records for MERO Training Session at West Whiteland Fire Company (May 12, 2014), attached as Exhibit 83; see also Attendance Records for MERO Training Session at Lionville Fire Company (October 26, 2017), attached as Exhibit 84.

In addition, on May 18, 2017. SPLP coordinated a Chester County Department of Emergency Services Pipeline Table Top Exercise, that included two emergency response scenarios – a release from a natural gas liquids pipeline and a release from a refined products pipeline – that was well attended by local emergency response personnel, including West Whiteland Fire Chief Bud Turner.

Most recently, on June 14, 2018, SPLP held a training with 10 members of the Chester County Hazmat Team that focused specifically on SPLP's control center operations, and how SPLP implements its control center procedures, including leak detection warnings and procedures for emergency response dispatch. **[BEGIN Highly Confidential Information subject to non-disclosure under the Protective Order and the Public Utility Confidential Security Information Disclosure Protection Act.]** [REDACTED] **[END Highly Confidential Information subject to non-disclosure under the Protective Order and the Public Utility Confidential Security Information Disclosure Protection Act.]** This training was requested by the Chester County Hazmat Team after the MERO training session held at the Goshen Fire Department on October 23, 2017. This training was planned and scheduled to accommodate the Chester County Hazmat Team's availability. At the hearing before ALJ Barnes, Senator Dinniman alleged that SPLP had refused to respond to the Chester County Hazmat Team's request for training, which is inaccurate. Moreover, this training in fact recently occurred.

Last, during the hearing before ALJ Barnes, Senator Dinniman introduced into evidence letters from the West Chester Area School District and the Downingtown Area School District, which requested that the Commonwealth perform an independent risk assessment study regarding the Mariner East 2 and 2X pipelines, including information on evacuation routes and procedures, detection equipment, and training for first responders. Both letters assert that this information is necessary to ensure that existing emergency response protocols are adequate. First, the Commission has not required any such independent risk assessment as a condition to resuming construction of the Mariner East 2 or 2X

pipelines. Second, and more importantly, as the above information and documents demonstrate, SPLP has provided necessary information to the school districts to enable them to establish adequate protocols for emergencies related to Mariner East 2 and 2X. In responding directly to the requests made by the school districts, John Zurcher an internationally recognized pipeline safety expert, who has been involved in the drafting of PHMSA's pipeline safety regulations (resume attached as Ex. 86), testified that the information provided is sufficient to respond to the Districts' requests. And third, there are other hazardous liquid and natural gas pipelines already located in these very same areas in Chester County and West Whiteland Township, and SPLP has already provided information to the public regarding emergency response procedures, consistent with information provided by these existing pipeline companies. The school districts' existing emergency response plans already contain, or should contain, evacuation procedures for potential pipeline safety incidents.

Response to Paragraph 6(a)(2)(c)

In addition to the public outreach and emergency response training set forth in SPLP's response to Paragraph 6(a)(2)(b) above, in accordance with PHMSA regulations, SPLP has adopted and implements specific SOPs that **address coordination with state and local officials, state and local emergency response agencies, PHMSA, the Commission, and other utilities in West Whiteland Township** for responding to a pipeline incident, which include the following:

- **SOP HLA.04 – Initial Reporting and Investigating Events**: establishes a process for observing, reporting and investigating events that involve, or have the potential to involve, loss to people, property or process. Copy attached as Exhibit 56.
- **SOP HLA.08 – Field Emergency Response Procedures**: provides instruction and guidance to field employees when preparing for and responding to an emergency event. All employees subject to involvement in an emergency response will be trained on the information and procedures contained herein. Copy attached as Exhibit 57.
- **SOP HLA.10 – Emergency Response Training Exercises**: describes the requirements for preparing and conducting emergency response training exercises. Copy attached as Exhibit 87.
- **SOP HLA.13 – Recognizing and Responding to Abnormal Operations**: establishes requirements for recognizing and responding to, evaluating, and correcting the cause of an Abnormal Operation (AO). Copy attached as Exhibit 88.
- **SOP HLA.15 – PHMSA -States - Accident Reporting**: lists processes, guidelines and responsibilities for accident reporting. Copy attached as Exhibit 58.

These SOPs reflect that SPLP regularly coordinates with state and local officials, emergency response agencies, PHMSA, the Commission, and other utilities in West Whiteland Township to prepare for and respond to a pipeline incident.

Response to Paragraph 6(a)(3)(a)-(b)

Paragraph 6(a)(3)(a)-(b) of the Order requires SPLP to submit copies of its current safety training curriculum for employees and contractors, including but not limited to: (a) proper pipeline construction, operation, and maintenance; and (b) identification of leaks and procedures for alerting emergency personnel.

SPLP maintains a detailed health and safety training curriculum for its own employees. Both administrative and "field" employees are trained on a variety of topics, including pipeline construction, operation and maintenance, leak detection, and emergency response procedures. SPLP's 2018 Safety Training Schedule, together with a chart describing the category of employees that receives each particular type of training, is attached as Exhibit 89. In addition, all SPLP employees who respond to an emergency event, and who serve on SPLP's National Incident Management Team, must complete specific training and obtain required certifications in accordance with the National Incident Management System/Incident Command System. A summary of this training and certification program is set forth in SPLP's Emergency Response Training Guidance, attached as Exhibit 90. SPLP's SOP HLA.10 – Emergency Response Training Exercises, listed above and attached as Exhibit 87, also describes SPLP's requirements for preparing and conducting emergency response training exercises for SPLP employees and supervisors.

SPLP also requires specific safety training for all contractors engaged in pipeline construction, which is detailed in the scope of work for each particular pipeline construction project. The applicable scope of work for the construction of the Mariner East 2 and 2X pipelines in West Whiteland Township is included in the "Spread 6" Scope of Work, which encompasses all work in Chester and Delaware Counties, and is attached as Exhibit 91.⁹ Contractor safety requirements are set forth in detail in Section 12.0 of this Scope of Work and appended in a separate attachment, which is provided as Exhibit 92. SPLP also provides a contractor safety brochure to each contractor during their safety orientation, which summarizes key health and safety information, a copy of which is attached as Exhibit 93.

In addition, prior to commencing construction of the Mariner East 2 and 2X pipelines in Chester and Delaware Counties, appropriate representatives for all construction contractor personnel were required to attend, and did attend, a full-day training session and project kick-off meeting, which included training on the following topics: health and safety; security; environmental issues; DOT compliance; government relations; construction support; permitting and land acquisition; welding requirements; and material handling and control systems. This full-day training session and project kick-off meeting was held on March 7, 2017 and was attended by 94 individuals, including multiple representatives from the contractors working on the Mariner East 2 and 2X pipeline project in West Whiteland Township.

⁹ A corresponding scope of work, with identical safety and safety training requirements, was issued for each of the six construction spreads on the Mariner East 2 and 2X pipeline project.

The two health and safety training presentations provided as part of this full-day training session and project kick-off meeting included both a health and safety overview training (attached as Exhibit 94) and a pipeline-specific health and safety training (attached as Exhibit 95), which described specific pipeline safety protocols, including: stop work authority; safety and security requirements; vehicle safety; fall protection; personal protective equipment; mobile/heavy equipment; hazard communication; excavation safety; gas monitoring, welding; excavation around known foreign lines; ladder safety; hand tool safety; compressed gas cylinders/flammables; and job safety analysis.

SPLP also held additional in-person contractor training sessions on February 1 and 2, 2018, for appropriate representatives for construction contractor personnel, which reemphasized health, safety, and environmental matters, including response to inadvertent returns of drilling mud from horizontal directional drilling (“HDD”) operations, and landowner complaints, including complaints regarding water supply concerns. This training included a test and certification which each attendee was required to pass before he or she could resume work on the Mariner East 2 and 2X pipeline project. The February 2018 in-person training session was attended by over 500 individuals, 72 of which are contractors working in Chester and Delaware Counties. Additional individuals also received training online – to date 1,324 individuals representing 34 contractor companies have received online training. A component of this training included SPLP’s HDD Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan, which was recently revised, and is attached as Exhibit 96. The February 2018 training also included review of SPLP’s Operations Plan, which further documents the measures and controls that SPLP and its contractors will implement so that the conditions of SPLP’s environmental permits are followed. The Operations Plan includes additional information on SPLP’s organization and chain of command, reporting, controls, and procedures for ensuring compliance and accountability with all environmental regulations, permits, and conditions during the construction and restoration phases of the Mariner East 2 and 2X pipeline project. A copy of the Operations Plan is attached as Exhibit 97.

Each contractor also develops a Site-Specific Safety Plan for each construction project. A copy of the relevant Site-Specific Safety Plan utilized by Otis Eastern, the prime contractor for Spread 6, which encompasses Chester and Delaware Counties, is attached as Exhibit 98.

SPLP has also adopted and implements safety training for pipeline operation and maintenance activities, which is detailed in the following SOP:

- **SOP HLA.18 – Operator Qualification Plan:** All individuals who operate and maintain pipeline facilities shall be trained, evaluated, and qualified to perform company identified Operator Qualification tasks and shall have the ability to recognize and react appropriately to Abnormal Operating Conditions (AOC) encountered while performing work. This Standard Operating Procedure (SOP) establishes the requirements and responsibilities for the qualification of individuals who perform Operator Qualification (OQ) Tasks at the pipeline facilities for which the operator has responsibility. Copy attached as Exhibit 99.

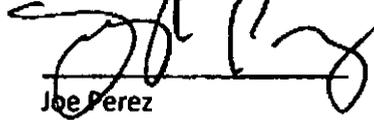
SPLP's inspection and testing protocols, SOPs, emergency response plans, public awareness plans, and safety training programs, are adopted and implemented in conformance with applicable PHMSA and Commission regulations, and are consistent with industry standards, and are regularly reviewed and audited by PHMSA and the Commission. In fact, within the last few months, the Commission's Investigation and Enforcement Bureau's Safety Division reviewed and evaluated SPLP's contingency plans to assess the potential safety risks associated with the Mariner East 1, Mariner East 2 and 2X pipelines. See Ex. 72, L-01-18 Information Request (Feb. 16, 2018).

In the last four years, PHMSA and the Commission have performed five audits of SPLP's pipelines and related facilities, which include: (1) August 2015 Commission inspection/audit of newly-constructed portions of Mariner East 1, which reviewed construction procedures, materials and welding, and also included a field inspection of the pipeline and related facilities; (2) November 2016 Commission inspection/audit of SPLP's emergency response and public awareness plans; (3) 2013 and 2014 PHMSA inspection/audit of the newly-constructed portions of Mariner East 1, which reviewed construction procedures, materials and welding, and also included a field inspection of the pipeline and related facilities; (4) 2017 PHMSA system inspection/audit for Mariner East 1, which reviewed, among other things, operating and maintenance procedures, records of maintenance activities, field inspection of pipelines and related facilities, leak detection procedures, the integrity management program, and the public awareness and emergency response programs; and (5) 2017/2018 Joint PHMSA and Commission Inspection of Mariner East 1, which included review of operational procedures, corrosion protection, the cathodic protection plan, integrity management, pipeline repair procedures, internal line inspection tools, emergency preparedness and response, personnel training, emergency response training, public awareness, liaison with public and emergency officials, maintenance records, high consequence area analysis, spill plume modeling, hydrostatic pressure tests, operations and maintenance repair criteria, program for preventive and mitigative measures, and the quality assurance program.

Copies of SPLP's SOPs, emergency response plans, public awareness plans, and safety training programs are maintained on the Company's internal electronic document repository, which is accessible to all employees. Copies of applicable SOPs, emergency response plans, public awareness plans, and safety training programs are also provided directly to contractors, and are maintained on a project-specific electronic document repository.

With the submission of the enclosed information and documents, SPLP respectfully requests that the Commission conclude that SPLP has submitted the documents necessary to satisfy the requirements of paragraph 6 of the Order so that construction of the Mariner East 2 and 2X pipelines in West Whiteland Township may be resumed upon submission of the verifications or affidavits from SPLP that the Pennsylvania Department of Environmental Protection has issued appropriate permissions to construct Mariner East 2 and 2X in West Whiteland Township. SPLP respectfully requests that this matter be placed on the agenda for consideration at the Commission's July 12, 2018 public meeting.

Respectfully submitted,



Joe Perez
Vice President, Technical Services
Energy Transfer

Enclosures

- cc: Public Utility Commission, Office of Special Assistants (w. encl., via hand delivery)
Mark L. Freed, Esquire (w. encl., via hand delivery)
Kathryn Urbanowicz, Esquire (w. encl., via hand delivery)
Virginia Marcille Kerlake (w. public documents only, via hand delivery)

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